

## **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In Re: Generic Investigation Into The Aggregate Electric Utility Reserve Margins Planned for Peninsular Florida

Docket No. 981890-EU Submitted for filing: May 27, 1999

## MOTION OF THE FLORIDA RELIABILITY COORDINATING COUNCIL, INC. FOR EXTENSION OF TIME TO FILE TESTIMONY

The Florida Reliability Coordinating Council, Inc., (FRCC), by and through its undersigned counsel, files its Motion for Extension of Time to File Direct Testimony pursuant to Florida Administrative Code Rule 28-106.204.

1. The May 21, 1999, Revised Order Establishing Procedure Order provides that prefiled testimony and exhibits from utilities is due by July 6, 1999, followed by intervenor testimony on July 19, staff testimony on August 2, 1999, rebuttal testimony on August 9, 1999. FRCC requests that the due dates for testimony be revised to provide that utility testimony be prefiled during the first week in August 1999.

2. The FRCC has annually provided to the Commission its Ten Year Load and Resource Plan for the region. This plan has been submitted to the Commission on July 1st of each year. Additionally, the FRCC has provided an analysis of its Reserve Margin Methodology to the Commission during the first week in August. Both the Ten Year Load and Resource Plan and the Reserve Margin Methodology Study utilize data which is filed by Florida electric utilities in response to the Commission's Ten Year Site Plan Order. It is this serial process that precludes the FRCC from filing the Ten Year Load and Resource Plan and the Reserve Margin Methodology Study at an earlier date.

> DOCUMENT NUMBER-DATE **DBB 90** MAY 28 % FPSC-RECORDS/REPORTING

AFA 2 APP 2 APP 2 DAF 2 DMU 2 EG 2 AAS 2 PC 2 IRR 2 IRR 2 IRR 2 INV 1 TH 2 AFA 2 APP 2 3. The Ten Year Load and Resource Plan, and the Reserve Margin Methodology Study, are key components of testimony which should be considered by the Commission in this docket. If the current schedule is maintained, the FRCC would not be in a position to file the above referenced documents with its testimony.

4. The FRCC hereby requests that utility testimony be delayed until the first week in August in order to allow the FRCC the opportunity to complete its Ten Year Load and Resource Plan and its Reserve Margin Methodology Study and include the results of those efforts as part of its prefiled testimony. This would provide an orderly process for the remaining testimony of the intervenors, PSC staff, and rebuttal testimony by all.

WHEREFORE the Florida Reliability Coordinating Council, Inc., requests entry of an order rescheduling the due-date for prefiled by the utilities to the first week in August 1999.

Dated: May 27, 1999

Respectfully Submitted

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Counsel for :

The Florida Reliability Coordinating Council, Inc.

## CERTIFICATE OF SERVICE

I HEREBY BY CERTIFY that a true and correct copy of the foregoing has been furnished to the following persons by U.S. Mail this  $27^{\text{H}}$  day of May, 1999.

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